

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

GLOBAL FORCE)
ENTERTAINMENT, INC. and)
JEFFREY JARRETT)
 Plaintiffs/Counter-Defendants,)
 v.)
 ANTHEM WRESTLING)
EXHIBITIONS, LLC,)
 Defendant/Counter-Plaintiff.)
	CIVIL ACTION NO. 3:18-cv-00749
	CHIEF JUDGE CRENSHAW
	MAGISTRATE BARBARA D. HOLMES
	JURY DEMAND

**PLAINTIFFS' MOTION TO FILE UNDER SEAL PLAINTIFFS' RESPONSE IN
OPPOSITION TO DEFENDANT'S MOTION IN LIMINE TO EXCLUDE EVIDENCE
OF ANTHEM SPORTS AND ENTERTAINMENT CORP'S
CORPORATE STRUCTURE AND FINANCIAL CONDITION**

Pursuant to paragraph 17 of the Court's Stipulated Protective Order entered by the Court (Dkt. 49), Plaintiffs Global Force Entertainment, Inc. ("GFE") and Jeffrey Jarrett respectfully move for leave to file under seal documents filed in support of Plaintiffs' Response In Opposition To Defendant's Motion In Limine To Exclude Evidence Of Anthem Sports And Entertainment Corp's Corporate Structure And Financial Condition.

In order for the Court to make the requisite findings and conclusions mandated by the Sixth Circuit, "[t]he proponent of sealing must provide compelling reasons to seal the documents and demonstrate that the sealing is narrowly tailored to those reasons—specifically by 'analyz[ing] in detail, document by document, the propriety of secrecy, providing reasons and legal citations.'" *Beauchamp v. Fed. Home Loan Mortg. Co.*, 628 Fed. App'x 202, 207 (6th Cir. 2016) (quoting *Shane Grp, Inc. v. Blue Cross Blue Shield of Mich.*, 825 F.3d 299 (6th Cir. 2016)). Generally,

“only trade secrets, information covered by a recognized privilege (such as the attorney-client privilege), and information required by statute to be maintained in confidence . . . is typically enough to overcome the presumption of [public] access.” *Rudd Equip. Co., Inc. v. John Deere Construction & Forestry Co.*, 834 F.3d 589, 594-95 (quoting *Baxter Int’l, Inc. v. Abbott Labs.*, 297 F.3d 544, 546 (7th Cir. 2002)).

This Motion is made on the grounds that Exhibits 1 and 2 to the Response have been previously designated by Defendant as “Confidential” pursuant to the Stipulated Protective Order. (Dkt. 49). Additionally, the testimony in Exhibits 3-7, as well as the text of the Response itself, pertains to the information or documents previously designated by Defendant as “Confidential.”

The Stipulated Protective Order requires a party receiving documents designated as confidential to keep those documents confidential, and to the extent any such document or information derived from those documents is filed with the Court, to file it in compliance with Section 5.07 of the Administrative Practices and Procedures for Electronic Case Filing for the United States District Court for the Middle District of Tennessee. (Dkt. 49). Accordingly, GFE hereby requests permission to file the exhibit under seal out of an abundance of caution.

Pursuant to Rule 7.01(a)(1), on June 12, 2020, Plaintiffs’ counsel contacted Defendant’s counsel to confer on the Motion to File Under Seal. Defendant’s counsel did not oppose the Motion.

WHEREFORE, Plaintiffs respectfully request that the Court grant leave to seal the above referenced exhibits. A copy of the exhibits to be filed under seal will be filed contemporaneously herewith under seal.

Dated: June 12, 2020

Respectfully submitted,

/s/ Samuel F. Miller

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June 2020, the foregoing document was filed via ECF:

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/s/ *Samuel F. Miller*

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